

March 3, 2014

CERTIFIED MAIL NO. 7010 1870 0002 9967 7222
RETURN RECEIPT REQUESTED

VIA Certified Mail – Return Receipt Requested and by Electronic Mail to:
gilley.anne@epa.gov

Ms. Anne Gilley (3HS61)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Eastman Chemical Resins, Inc.
Continuous Release – Emergency Response Notification System (CR-ERNS)
Identification Number 41015

Dear Ms. Gilley:

This letter is in further response to your correspondence dated January 8, 2014 regarding the above-referenced matter, which letter was addressed to 'General Manager' of the Eastman Chemical Resins, Inc. ("Eastman") facility located at State Highway 837, West Elizabeth, PA 15088, and which was received at the facility on or about January 13, 2014. Eastman's initial response to your inquiry was provided during a January 29, 2014 telephone conference between you and Stacia Christman of Eastman, wherein you indicated that additional time to respond was acceptable to the agency ("U.S. EPA, Region III" or "agency").

As indicated previously, Eastman intends to cooperate fully with the U.S. EPA, Region III in this matter and submits this response in the spirit of such cooperation and good faith. However, to preserve its rights, defenses and any objections that might apply, Eastman asserts and expressly and specifically reserves, and does not waive, any and all rights and defenses available to it with regard to this matter and objects to the extent that the information requested is beyond the agency's statutory jurisdiction or authority, overly broad and unduly burdensome, or vague and ambiguous, or is subject to any applicable attorney-client privilege or work product or other similar doctrine.

As indicated on the enclosed questionnaire, the referenced CR-ERNS Report # 41015 is not ongoing because each of the releases (as described in Section II (Source Information) of the documentation that you provided with the January 8, 2014 letter) has been eliminated or otherwise reduced to below applicable reportable quantities ("RQs") as described below.

CR-ERNS#: 41015 - HAZARDOUS SUBSTANCE AND SOURCES

BORON TRIFLUORIDE

- Production Unit #1 (WW Poly)
- Production Unit #2 (MP-Poly)
- Production Unit #3 (B-Poly – no longer in service)

EPA QUESTIONNAIRE

- 1.b.i. *“Provide the date when the release was terminated.”*
1.b.ii. *“Describe the events/changes that occurred at the facility which eliminated or reduced the release below its RQ.”*

EASTMAN CHEMICAL RESINS, INC. RESPONSE

The continuous releases were terminated in the 1990's. In 1990, two soda ash scrubbers were installed in order to address BF₃ emissions from process activity. In 1999, an emergency scrubber for the BF₃ tube trailer storage building was installed. The BF₃ scrubber is a two stage system that uses city water to neutralize the BF₃ gas. The gas passes through a packed bed that neutralizes the acidity. Next the gas goes through a fiber bed filter that removes the visible plume. In 2013, the tube trailers were replaced with cylinders stored in the same building. The building vents to the emergency scrubber which also captures any remaining BF₃ emissions from the soda ash scrubbers.

CR-ERNS#: 41015 - HAZARDOUS SUBSTANCE AND SOURCES

AMMONIA

- Refrigeration System #1
- Refrigeration System #2
- Refrigeration System #3
- Refrigeration System #4
- Refrigeration System #5
- Process Unit – Stack Emissions

EPA QUESTIONNAIRE

- 1.b.i. *“Provide the date when the release was terminated.”*
1.b.ii. *“Describe the events/changes that occurred at the facility which eliminated or reduced the release below its RQ.”*

EASTMAN CHEMICAL RESINS, INC. RESPONSE

EASTMAN

The continuous releases were terminated in 2005. In 2005, the J411 VOC refrigerated condenser control system for the C-5 polymerization process was replaced with a thermal oxidizer. This eliminated the refrigeration system and associated emissions in the continuous release report. The thermal oxidizer is identified as a source in one of the facility's Allegheny County Health Department's air permit.

CR-ERNS#: 41015 - HAZARDOUS SUBSTANCE AND SOURCES

NITRIC OXIDE
NITROGEN DIOXIDE (NO₂)

- Combustion Units – Industrial Boilers
- Combustion Units – Process Heaters

EPA QUESTIONNAIRE

- 1.b.i. *"Provide the date when the release was terminated."*
1.b.ii. *"Describe the events/changes that occurred at the facility which eliminated or reduced the release below its RQ."*

EASTMAN CHEMICAL RESINS, INC. RESPONSE

The continuous releases were reduced to below applicable reportable quantities in 2006 when the EPA provided that facilities are not required to report releases of less than 1,000 pounds of NO_x to the air within a 24 hour period due to combustion, or combustion related activities. Further, in 2012, the facility's boilers #1, #2, #3 and #4 were replaced with new ultra-low NO_x burner boilers B-U1, B-U2, B-U3 and B-U4. The boilers are subject to minor modification permit number: 0058-I020 and are permitted to burn natural gas only with heat input limited to 18.6 MMBtu/lb.

If you require additional information in relation to this matter, please contact me
at **Ex. 4 - CBI** or contact **Ex. 4 - CBI**
Ex. 4 - CBI

Sincerely,

Ex. 4 - CBI



EASTMAN

Enclosure [Questionnaire]

CC:

Ex. 4 - CBI

Ex. 4 - CBI

Questionnaire

Regarding CR-ERNS Report # 41015, please provide the following information:

1. Is the continuous release ongoing? ☐ Y ☒ N
- a. **If yes**, please review your written anniversary notification (attached) for accuracy, make changes as necessary, and return the revised document with this questionnaire. In addition, please ensure you complete any highlighted areas, which will help EPA conduct a risk assessment.
- b. **If no**, please provide the following information and skip the Certification:
- i. Provide the date when the release was terminated. Please see attached
- ii. Describe the events/changes that occurred at the facility which eliminated or reduced the release below its RQ.
Please see attached

2. CERCLA requires the facility to annually evaluate its continuous releases to assure that information previously submitted has not changed [40 CFR § 302.8(i)]. Do you conduct these annual evaluations? ☐ Y ☐ N
- a. **If yes**, we request you submit a copy of the evaluation conducted for calendar year 2013. You may submit paper copies of these records, or provide this information in an electronic format (e.g., compact disc, email, etc.)
- b. **If no**, please state when the last annual evaluation was completed and explain why evaluations were discontinued.

At the bottom of your Response, please include the following certification:

CERTIFICATION:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to the Information Request Letter and all attached documents, and that based on my inquiry of those individuals responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fines and/or imprisonment (18 U.S.C. § 1001).

Signature
Printed Name
Title
Date Signed

Ex. 4 - CBI

03/03/2014